

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

(1) JOSHUA FIELDS)	
)	
Plaintiff,)	
)	
v.)	Case No. 21-cv-00986-G
)	
(1) GREAT LAKES INSURANCE SE,)	<i>Removed from the District Court of</i>
)	<i>Kay County, State of</i>
(2) MJ KELLY COMPANY, and)	<i>Oklahoma, Case No. CJ-2021-00037</i>
)	
(3) CAPSTONE ISG,)	
)	
Defendants.)	

PLAINTIFF’S PROPOSED VOIR DIRE

COMES NOW Plaintiff, Joshua Fields, and respectfully requests the Court propound the following questions during its voir dire examination of the prospective jurors in this case:

I. Juror Background Information

1. What is your age?
2. What is your occupation/job and how long have you been employed as such?
3. Do you enjoy your job? Why?
4. Are you married? If so, please tell us about your spouse.
5. Do you have any children? If so, please provide their names and ages.
6. Do you attend a religious service on a regular basis? If so, where do you attend?
7. What is your favorite movie and/or television show? Please explain why it is your favorite.

8. What is your favorite kind of music? Please explain.

9. Have you every served on a jury? If so, briefly describe the type of lawsuit, if you served as foreperson and whether or not your jury rendered a verdict.

10. If you served on a jury, briefly describe how you felt about the experience.

II. Experience with Insurance

1. Do you own or rent your home?

2. Do you have homeowner's or renter's insurance? If so, which company provides your homeowner's or renter's insurance?

3. Have you ever made an insurance claim of any kind? If so, please explain what type of claim(s) you made and what your claim's handling experience was like.

4. On a scale of 1 to 10, with 1 being "not satisfied", 5 being "no opinion", and 10 being "fully satisfied", were you satisfied with the result of your insurance claim(s)? Please explain your answer.

5. Do you feel that your experiences with that claim or those claims will cause you to be biased in deciding a case about an insurance claim?

6. Have you ever heard of Great West Insurance SE? If so, what do you know about State Farm Fire & Casualty Company?

7. Have you or anyone in your family had any experience involving Great West Insurance SE?

8. Do you have any training in insurance claim investigations or handling insurance claims? If so, please describe.

IV. Parties

1. Do you Joshua Fields or his immediate family? If so, how do you know him or his family?

2. Do you know any of the lawyers present in the courtroom or their law firms?

3. If you know any of the parties or their attorneys, will that cause you problems in listening to the evidence in this case and rendering a verdict for one or the other parties?

III. Damages

1. Some jurors believe that plaintiffs should not be awarded money for mental and emotional pain and suffering, while other jurors believe they should. What do you believe? Please explain your answer.

IV. Potential biases, prejudices, and concerns

1. Some people see themselves as leaders, and some people see themselves as followers. How do you see yourself? Please explain.

2. In this case, the Plaintiff is only required to prove his case by showing what is more probably true than not. Will you be okay with rendering a verdict based on whether something has been proven as more probably true than not versus something proven conclusively or without a doubt?

3. During deliberations in this case, will you ask the court for help if a jury instruction or certain law is not clear to the whole jury panel?

2. Based on what you've heard so far in relation to this case, is there anything else that you think the parties or the Court should know about you? If so, please explain.

Respectfully submitted,

MARTIN JEAN & JACKSON

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CERTIFICATE OF SERVICE

I hereby certify that on the 7th day of November 2022, I electronically transmitted the attached document to the Clerk of the Court using the ECF System for filing. Based on the records currently on file, the Clerk of the Court will transmit a Notice of Electronic Filing to the following ECF registrants, via email:

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s/ Scott R. Jackson
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